

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
SCANSOFT, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 04-10353-PBS
)	
VOICE SIGNAL TECHNOLOGIES, INC.,)	
LAURENCE S. GILLICK, ROBERT S.)	
ROTH, JONATHAN P. YAMRON, and)	
MANFRED G. GRABHERR,)	
)	
Defendants.)	
_____)	

**DECLARATION OF DANIEL M. FORMAN
IN OPPOSITION TO MOTION TO DISQUALIFY
GOODWIN PROCTER LLP**

I, Daniel F. Forman, hereby state as follows:

1. I am an associate at the law firm of Goodwin Procter LLP and am counsel of record for the Plaintiff, ScanSoft, Inc., in the above captioned case. I submit this declaration in support of the Memorandum of ScanSoft in Opposition to Motion to Disqualify Goodwin Procter LLP.

2. Attached hereto as Exhibit A are true and accurate copies of pages from VST's web site, entitled "i730."

3. Attached hereto as Exhibit B is a true and accurate copy of "VoiceSignal's VSuite™ 2.0 for the Samsung i730: User Guide," which I downloaded from VST's web site.

4. Attached hereto as Exhibit C is a true and accurate copy of "Using the Voice Features of the Samsung® i600: Version 1.2.08," which I downloaded from VST's web site.

5. Attached hereto as Exhibit D is a true and accurate copy of a press release on VST's web site entitled "Samsung Telecommunications America Debuts Phone With Revolutionary Speech-to-Text Capabilities," dated January 5, 2005.

6. Attached hereto as Exhibit E is a true and accurate copy of a press release on VST's web site entitled "VoiceSignal's New Speech Application Provides Unparalleled User Experience," dated September 19, 2005.

7. Attached hereto as Exhibit F is a true and accurate copy of a press release on VST's web site entitled "VoiceSignal Unveils Top Secret Speech Synthesis Research Project at CTIA," dated September 26, 2005.

8. Attached hereto as Exhibit G are true and accurate copies of excerpts from the "Amended Response of Voice Signal Technologies, Inc. to Plaintiff's First Set of Interrogatories," dated February 4, 2005.

9. Attached hereto as Exhibit H are true and accurate copies of pages from VST's web site, entitled "Product Gallery (All)."

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 18th day of November, 2005.

A handwritten signature in black ink, appearing to read "Daniel F. Forman", written over a horizontal line.

Daniel F. Forman